of this application and it is not seen how it can be obvious to modify this reference to meet the above-noted limitation when the inventor of EP 702929 did not set forth any resolution of the disclosed problems solved by the above-noted critical limitation.

Claims 2 – 7 and 10 further require rubber backing shield to possess a heat shrinkage factor of from about 2.0% to about 2.5% which, like the above limitation, is not shown or disclosed in any of the cited and/or applied references. In the absence of recognition of the problems solved by these two limitations and the solution thereto, it is not seen how it would be obvious to modify the basic reference to meet these limitations. As noted in the specification, floor mats, such as shown and disclosed in EP 702929, have the floor lay and washing problems solved by the above-noted limitations. Applicants have claimed a floor mat which has a longer service life and still maintain the required floor lay properties.

Claim 11, like Claim 1, requires the heat limitation of shrinkage for the non-woven carpet pile substrate and further requires both the rubber sheet backing and the reinforcement strip to have a strength "modulus" of greater than about 1,000 pounds per square inch. In opposition to the Examiner's comment, it is up to the Examiner to establish whether the cited references have the claimed combination of limitations since the inventors, by their declaration, state that as far as they know what is claimed is new and novel. Therefore, Claims 11 – 17 are clearly patentable over EP 702929 since this reference does not meet the combined limitations set forth above and are not obvious since such is not disclosed or anticipated in the EP reference.

Therefore, it is respectfully requested that Claims 1 – 8 and 10 – 17 be allowed and that

the application be passed to issue.

Respectfully requested,

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